

# Law Offices of Colin Mulholland

Employment and Civil Litigation

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**MEMO ENDORSED**

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November 6, 2024

Honorable Valerie E. Caproni  
United States District Judge  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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Re: Gonzalez v. Nuevo Three Way Inc., et al  
**24-cv-04751 (VEC)**

Your Honor,

Plaintiff writes to respectfully request that the Plaintiff be permitted until December 6<sup>th</sup>, 2024 to submit an Order to Show Cause for Default Judgment. The undersigned requires additional time to co-ordinate with Plaintiff to execute a complete and translated declaration of facts to obviate the need for an inquest.

This is the first request for an extension.

*/s/Colin Mulholland, Esq.*  
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Application GRANTED IN PART. The deadline for Plaintiff to move for an order to show cause why default judgment should not be entered against all Defendants is ADJOURNED to **Friday, November 22, 2024.**

SO ORDERED.

 11/6/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE